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Attorneys for Defendant,  
TARGET CORPORATION

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

MICHELLE ARENDES,

Plaintiff,

v.

TARGET CORPORATION,

Defendants.

Case No. 2:21-cv-01374-KJM-AC

**STIPULATION TO CONTINUE FACT  
DISCOVERY DEADLINE;  
[PROPOSED] ORDER**

**STIPULATION**

Plaintiff MICHELLE ARENDES, and Defendant TARGET CORPORATION collectively referred to as “the Parties”) have agreed, by and through their attorneys of record, to stipulate to the following:

**WHEREAS**, the matter is currently scheduled for trial on January 17, 2023;

**WHEREAS**, fact discovery cut off is currently set for August 31, 2022;

**WHEREAS**, the parties have been delayed in completing necessary depositions due to witness unavailability;

**WHEREAS**, additional time will allow the Parties to complete fact discovery and engage in meaningful mediation;

**WHEREAS**, the Parties agree a continuance for the deadline for fact discovery would be in the best interests of all parties;

1       **WHEREAS**, there have been no prior continuances of fact discovery;

2       **WHEREAS**, parties have agreed to extend fact discovery cut off to September 30, 2022;

3       **IT IS THEREFORE STIPULATED AND AGREED**, by and between the Parties, through  
4 their respective counsel that: the deadline to complete fact discovery in this matter shall be continued  
5 to September 30, 2022.

6  
7 **IT IS SO STIPULATED AND AGREED.**

8  
9 DATED: August 5, 2022

**MANNING & KASS**  
**ELLROD, RAMIREZ, TRESTER LLP**

11  
12 By: /s/ David V. Roth

13 David V. Roth  
14 Chandra A. Carr  
15 Attorneys for Defendant,  
16 TARGET CORPORATION

17 DATED: August \_\_, 2022

**MASTRANGELO LAW OFFICE**


18  
19 By: \_\_\_\_\_

20 Nick Mastrangelo  
21 Attorneys for Plaintiff MICHELLE ARENDES

22 **[PROPOSED] ORDER**

23       The Court having reviewed the stipulation between the Parties, and good cause appearing  
24 therefore, hereby orders that the deadline to complete fact discovery is continued to September 30,  
25 2022.

26 DATED: August 22, 2022

  
27 **ALLISON CLAIRE**  
28 **UNITED STATES MAGISTRATE JUDGE**